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September 13, 2024

Via ECF

The Honorable John L. Sinatra, Jr.
United States District Judge
Robert H. Jackson United States Courthouse
2 Niagara Square
Buffalo, New York

Re: Christian v. James, No. 22-cv-00695

Dear Judge Sinatra,

This office represents defendant Steven G. James in his official capacity as Superintendent of the New York State Police. I write to enclose digital copies of the two historical statutes Your Honor requested during yesterday's oral argument on the cross-motions for summary judgment.

Attached as **Exhibit 1** is a copy of the 1771 New Jersey law discussed at oral argument, 1771 N.J. Laws 343-47, including page 343, which had been unintentionally omitted from the version attached from the Belka Declaration. The law is entitled "An ACT for the Preservation of Deer and other Game, and to prevent trespassing with Guns," demonstrating a legislative intent to protect private property rights by empowering an owner to know of and control armed carriage on his or her property. Id. at 343; cf. Wolford v. Lopez, __ F.4th __, 2024 WL 4097462, at *23 (9th Cir. Sept. 6, 2024) (concluding that this law is a "dead ringer" for Hawaii's modern statute because it "simply prohibited the carry of firearms on private property without consent.").

And attached as **Exhibit 2** is a copy of the 1790 Massachusetts statute briefly discussed at yesterday's oral argument, I Private and Special Statutes of the Commonwealth of Massachusetts 258-60 (Manning & Loring 1805). We thank the Court for its time and consideration.

Respectfully submitted,

James M. Thompson
Special Counsel